



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

18 2016

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Marwan Fanek
Hudson Valley Health Care System
2094 Albany Post Road
Montrose, New York 10548

Re: EPA's Evaluation of Site Inspection Report for VA Montrose Site (NYD135495604) October 2014 and Site Re-assessment of VA Castle Point (NY8360007282) Based on 2014 SI & 2015 SSI Reports

Dear Mr. Fanek:

This letter pertains to the United States Environmental Protection's (EPA) review of the aforementioned documents for the VA Montrose and VA Castle Point sites. As you know, both facilities are listed on our Federal Agency Hazardous Waste Compliance Docket and hence, subject to site assessment evaluations. Listed below are EPA's comments pertaining to the site assessment determinations for each site.

Site Inspection for VA Montrose Site - We have determined that the site is not a potential candidate for the National Priorities List (NPL) based on the October 2014 Site Inspection Report. Hence, the site has been assigned a designation of No Further Remedial Action Planned (NFRAP) which means no additional steps under the Superfund program will be taken at this time. Although the October 2014 Site Inspection (SI) report indicated that there were some observed releases of contaminants, there are no receptors impacted (e.g., drinking water is provided by a public supply, groundwater was never used as a source for potable water, no surface water intakes for drinking water, Hudson River has a huge dilution factor). However, please be aware that a NFRAP decision does not preclude any further action at the site by another EPA program, the State, or other Federal Agency.

Site Re-assessment for VA Castle Point (2014 Site Inspection Report & 2015 Supplemental Site Inspection Reports) - Based on the latest "new" information submitted to our agency, we have determined that this site is not a potential candidate for the NPL and has also been designated a NFRAP. This determination is due to the following: the pathway of concern (groundwater) is already being addressed through water treatment and although there is a documented release of copper, post treatment, the detected concentrations up to 90.4/ug/l are well below the EPA Maximum Contaminant Level (MCL) of 1300 ug/l; drinking water is subject to regular testing to ensure compliance with state drinking water standards; and the use of onsite landfills ceased in 1978, so new contamination is not expected to be present at the site. It should be noted that the Hazardous Ranking System score (HRS) provided in the SSI appears to have been calculated in error, thus, possibly indicating a misleading and elevated score. Subsequent information provided to EPA seemed to show that a simple calculation of residents instead of wells within a 4-mile target distance may have been erroneously utilized in the scoring process. Once again, as with the site above, a NFRAP determination does not preclude any further action at the site by another EPA program, the State, or other Federal Agency.

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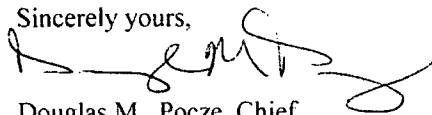
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I hope the above information is helpful to you. If you have any questions, please contact Ms. Helen Shannon, Region 2 Docket Coordinator at 212 637-4260.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'D. Pocze', with a stylized flourish extending to the right.

Douglas M. Pocze, Chief
Federal Facilities Section